



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

MEMORANDUM

DATE: February 8, 1980
TO: Permit Processing Personnel
FROM: William B. Krenz, Asst. Director of Engineering /s/ by WBK
SUBJECT: Brake Shoe Grinding Operations

Rule 219 exempts certain equipment from permit requirements unless the equipment or process material is subject to Regulation X. Certain grinding operations, including those associated with the manufacture, preparation and installation of brake shoes, are covered by Section (g)(1) of this rule. This does not exempt all brake shoe grinding operations, however, as the shoes contain asbestos which is subject to Regulation X--Rule 1002. As Section (b)(5)(B) of Rule 1002 exempts "those operations that primarily install asbestos friction materials on motor vehicles" from Rule 1002, the exemption from the permit system in Rule 219(g)(1) applies to the grinding operations in the repair shops.

In summary, brake shoe grinding operations directly associated with the installation of the shoe onto the motor vehicle are exempt from the permit system. Those brake shoe grinding operations associated with the manufacture of the lining or the attachment of tile lining to the metal shoe are not exempt from the permit system.

WBK:ao

cc: A.H. Segal